

Paige Hammer WSB #7-5882  
Assistant United States Attorneys  
District of Wyoming  
P.O. Box 668  
Cheyenne, WY 82003  
(307) 772-2124  
[paige.hammer@usdoj.gov](mailto:paige.hammer@usdoj.gov)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**Docket No. 23-CR-161-J**

**ADAM SHANE AVILES, JR,**

Defendant.

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**GOVERNMENT'S *SECOND SUPPLEMENTAL* NOTICE OF INTENT  
TO OFFER EXPERT TESTIMONY**

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The United States of America hereby submits its *second supplemental* notice of intent to offer expert testimony. Fed. R. Crim. P. 16(a)(1)(G). The United States reserves the right to further supplement this notice.

***SPECIAL AGENT MATTHEW WRIGHT, BUREAU OF ALCOHOL TOBACCO & FIREARMS***

***Qualifications:*** Matthew Wright is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) stationed in Cheyenne, Wyoming. SA Wright's training and experience in this area are set forth in his Statement of Qualifications, attached hereto as **Exhibit 1**. Within the past four years, SA Wright has authored no publications and has testified as an expert in one jury trial. *United States of America v. Roland French*, 22-CR-00054-ABJ (D. Wyo. 2022). Fed. R. Crim. P. 16(a)(1)(G)(iii).

***Summary of Testimony:*** SA Wright is expected to testify as to his extensive training and experience regarding the identification, origin, and classification of firearms under federal firearms law, to include issues relating to the interstate nexus of firearms. SA Wright would testify as to the identification, location of manufacture, and the subsequent transportation of the ammunition and firearm at issue in the instant offense, including but not limited to the fact the ammunition and firearm in this case were not manufactured in Wyoming and were therefore transported from another state into Wyoming. More specifically, and consistent with his written reports/nexus memorandums, SA Wright is expected to testify that the Glock, Model 41, .45 caliber pistol, serial number BYAT730, was manufactured in Austria by Glock and imported into the United States by Glock Inc. in Smyrna, Georgia. Further, SA Wright is expected to testify that the Fiocchi, 45 ACP caliber ammunition, was manufactured in Italy by Fiocchi. SA Wright's reports have been previously provided in discovery and summarizes that the ammunition and firearm at issue in this matter were in and affecting interstate commerce.

The United States asserts that this notice and the report previously provided to the Defendant satisfies the requirements of Rule 16(a)(1)(G). If, after viewing this notice and the attachments, the Defendant requests further information or has concerns under Rule 16, the United States requests the Defendant advise as to what further information is necessary to prepare for trial.

Respectfully submitted this 29th day of April, 2024.

NICHOLAS VASSALLO  
United States Attorney

By: /s/ Paige Hammer  
PAIGE HAMMER  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2024, the foregoing was filed via CM/ECF and thereby served upon counsel for the Defendant.

/s/ Janee Woodson  
UNITED STATES ATTORNEY'S OFFICE